

CC Docket 94-102

Enhanced 911 Tier III Interim Report

Cellular South Licenses, Inc.

September 1, 2005

Cellular South Licenses, Inc. ("Cellular South") is a Tier III CMRS carrier that operates primarily in Mississippi, Tennessee, Alabama and Florida markets. It holds licenses in the cellular radiotelephone services and in the broadband personal communications services. This report is submitted in accordance with the provisions of the Commission's Order in *Revision of Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems and E911 Phase II Compliance Deadlines for Tier III Carriers*, CC Docket 94-102, (rel. April 1, 2005).

Item 1: Number and Status of Phase I and Phase II Requests from Public Safety Answering Points (PSAPs)

Cellular South has received a total of 103 valid requests for E911 services. Of those, 79 are for Phase I services, and 24 are for Phase II services. Cellular South is timely fulfilling all requests. Of the Phase I requests, 76 have been fulfilled. Of the Phase II requests, 20 have been fulfilled, and the PSAPs who have requested and are capable of receiving and processing E911 Phase II data are receiving such data from Cellular South.

In Mississippi, Cellular South has received from PSAPs 62 requests for Phase I services and 7 requests for Phase II services. All requests have been or will be timely fulfilled. Presently, 3 fresh requests are pending for Phase I services, and 4 fresh requests are pending for Phase II services.

In Tennessee, Cellular South has received from PSAPs 12 requests for Phase I services and 12 requests for Phase II services. All requests have been timely fulfilled.

In Alabama, Cellular South has received from PSAPs 2 requests for Phase I services and 2 requests for Phase II services. All requests have been timely fulfilled.

In Florida, Cellular South has received from PSAPs 3 requests for Phase I services and 3 requests for Phase II services. All requests have been timely fulfilled.

Item 2: Carrier's Specific Technology Choice

Cellular South has formally elected to deploy a handset-based solution for delivery of E911 Phase II services. The solution is operating on the CDMA network system which Cellular South installed during the first quarter of 2004.

Item 3: Status of Ordering and/or Installation of Necessary Network Equipment

Cellular South has completed installation and testing of equipment necessary to transmit Phase I and Phase II data to PSAPs. The services of Intrado are utilized to coordinate with PSAPs, to operate the location database and to optimize E911 performance on Cellular South's CDMA network system, which utilizes Nortel DMS-MTX and Lucent Autoplex-1000 switches.

Item 4: Date on Which Phase II Service Was/Will First Be Available in the Carrier's Network

Cellular South initially deployed Phase II services as follows:

Mississippi	October 2003
Tennessee	August 2003
Florida	February 2004
Alabama	February 2004

Item 5(a): Automatic Location Identity ("ALI")-Capable Handset Availability

Cellular South is currently selling E911 Phase II compliant handsets throughout its service area. Cellular South has experienced no particular difficulty obtaining ALI-capable handsets at reasonable prices.

Item 5(b): Information on Progress Towards Ensuring that Ninety-Five Percent of the Carrier's Subscriber Base Has Location-Capable Handsets.

All digital phones newly activated on Cellular South's network are ALI-capable, and have been since November 26, 2004, ahead of the FCC appointed date of November 30, 2004. In November 2004 Cellular South began a vigorous marketing campaign to encourage existing subscribers to trade in their old phones for ALI-capable handsets. The effort has resulted in increasing the overall penetration rate of ALI-capable phones from

74% to 82%. The penetration rate has been increasing by an average of about 1% per month.

Among other education and marketing strategies, Cellular South conducts a direct outbound calling campaign to customers whose phones are not ALI-capable. Customers are offered free phones under their existing contract terms. Even so, not all customers can be enticed to switch to CDMA ALI-capable handsets. No matter what commercially reasonable offers are made, some subscribers refuse to relinquish their favored handsets. Even under normal circumstances Cellular South has a low rate of churn, and some original system customers understandably still want to use the large bag phones and high power analog phones on farms and rural roads where signal strength is less than optimal for use of newer phones. Many customers who use TDMA and non-ALI-capable CDMA phones are simply resistant to adopting new technology phones with new features that have to be learned and phones that have to be programmed with favorite telephone numbers and other essential, personal data.

Exercising its best efforts, Cellular South expects that by the end of 2005 the penetration rate of ALI-capable handsets on its network will be only about 86%. It is anticipated that it will take another year, perhaps until December 31, 2006, to achieve 95% penetration.